

# United States District Court

MIDDLE

DISTRICT OF

ALABAMA

UNITED STATES OF AMERICA

v.

EDWARD EARL TILLER,  
MICHAEL LEE WALKER,  
TISI NICOLE JACKSON

## CRIMINAL COMPLAINT

CASE NUMBER:

*1:06mj17-VPM*

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 8, 2006, in Houston county and elsewhere within the Middle District of Alabama defendant(s), (Track Statutory Language of Offense)

knowingly and intentionally possessed with intent to distribute cocaine and cocaine base,  
a Schedule II Controlled Substance,

in violation of Title 21 United States Code, Section(s) 841(a)(1). I further state that I am

a(n) DEA Special Agent and that this complaint is based on the following facts:  
Official Title

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED BY REFERENCE

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

\_\_\_\_\_  
Signature of Complainant

Sworn to before me and subscribed in my presence,

February 10, 2006  
Date

at

Montgomery, Alabama  
City and State

Vanzetta Penn McPherson, U. S. Magistrate Judge  
Name & Title of Judicial Officer

*Vanzetta Penn McPherson*  
Signature of Judicial Officer

AFFIDAVIT

I, Devin Whittle do solemnly depose and state the following:

- 1) I am an Special Agent with the United States Drug Enforcement Administration (DEA) and have been so employed since March, 1996. Prior to my appointment as a Special Agent, I was employed as a detective with the City of Montgomery (AL) Police Department for over eight years. During a part of my tenure with the Montgomery Police Department, I was assigned to the Narcotics Division and was responsible for the investigation of violations of state and federal narcotics laws.
- 2) As a Special Agent for DEA, I am currently responsible for the investigation of federal offenses involving the alleged manufacturing, distribution and possession to distribute narcotics in the United States, specifically within the Middle District of Alabama. I have received training in how to conduct investigations of offenses relating to the manufacturing, distribution and possession with intent to distribute narcotics in the United States.
- 3) This affidavit is being made in support of a request for a complaint against Edward Earl Tiller, Michael Lee Walker, and Tisi Nicole Jackson.
- 4) The factual information contained in this request and affidavit is based upon my investigation and upon information provided to me orally and in written form by officers with the Houston County Sheriff's Department (AL) and other law enforcement officers. Because this affidavit is being submitted for the purpose of securing a complaint, it does not contain all the information from the investigation, but only those facts deemed necessary to establish probable cause for the requested complaint.

- 5) I have probable cause to believe that above-named individuals violated Title 21, United States Code, Section 841(a)(1) involving the manufacturing, distribution and possession with intent to manufacture and distribute cocaine and cocaine base, Schedule II Controlled Substances, on or about February 8, 2006, in Houston County, within the Middle District of Alabama.

LOCAL INVESTIGATION

- 6) On February 8, 2006, Deputy Sheriff Thomas Flathmann of the Houston County, Alabama Sheriff's Department received information regarding drug activity at 927 Honeysuckle Road, Apartment #D51 in Dothan, Alabama. The information received by Deputy Flathmann was regarding possible drug activity at this location. A confidential and reliable source, hereafter referred to as the CS, provided information regarding the amount of vehicle traffic as well as that frequency and the short time visitors stayed at the apartment. Further, this CS has provided reliable information to Deputy Flathmann in the past. Deputies of the Houston County Sheriff's Department and Agents of the Drug Enforcement Administration (DEA) have no reason to believe that the CS has provided any false or misleading information regarding this or any other investigation.

Based on the above information provided by the CS, Deputies of the Houston County Sheriff's Department initiated surveillance at 927 Honeysuckle Road, Apartment #D51 in Dothan, Alabama on February 8, 2006. Deputies determined Edward TILLER rented apartment #D51. Further, Deputies ran a check on TILLER and determined that he has an arrest and conviction for distributing drugs.

During surveillance at 927 Honeysuckle Road, Apartment #D51, Deputies Flathmann and McCord observed an individual, later identified as Michael Lee WALKER, exit apartment #D51 carrying a brown paper bag. WALKER walked to and entered a Chevrolet Suburban bearing Alabama license plate 38H033K. Deputies followed the Chevrolet Suburban and observed the vehicle being driven erratic and changing lanes without a signal. Based on the traffic violations, deputies conducted a traffic stop on the Chevrolet Suburban near the intersection of Ross Clark Circle and U.S. Highway 84 in Dothan, Alabama. It was at this time that deputies identified Michael Lee WALKER as the person driving the Chevrolet Suburban and the individual who they observed carry the brown paper bag from apartment #D51. Deputies subsequently identified the passenger of the Chevrolet Suburban as Tisi Nicole JACKSON.

After receiving WALKERS' driver's license, deputies determined that he had an outstanding warrant regarding a domestic violence charge. WALKER exited the vehicle and deputies searched him for weapons. Deputies asked WALKER for consent to search the Chevrolet Suburban and received consent to search from WALKER. During the search, deputies Flathmann and McCord observed the purse of Tisi Nicole JACKSON sitting on the passenger floorboard of the truck. In plain view the deputies observed a small brown paper bag inside of the purse. Inside the brown bag, the deputies found a clear plastic bag that contained an off white substance. The deputies stated that this was the same brown paper bag they observed WALKER carry out of apartment #D51 at 927 Honeysuckle Road. When deputies located the bag in JACKSONS' purse, WALKER then advised

deputies that he was currently on probation regarding Federal drug charges. The off white substance inside the brown paper bag was two "cookie" shaped materials field that tested positive for cocaine and weighed approximately 28 grams. This substance is believed to be crack cocaine. Without being questioned, WALKER told deputies that the cocaine was his and that he had placed it inside of JACKSONS' purse when they were stopped.

Based on the above events, deputies maintained surveillance on 927 Honeysuckle Road, apartment #D51 in Dothan, Alabama while they obtained a search warrant from a State of Alabama Circuit Court Judge. During the search, deputies located four and a half, off white substances, "cookie" shaped materials, that field tested positive for cocaine and weighed approximately 60 grams. This substance is believed to be crack cocaine. Further, deputies seized a plastic bag containing a white powder substance that field tested positive for cocaine. This substance is believed to be cocaine hydrochloride or powder cocaine. Deputies recovered \$3,290.00 of suspected drug proceeds in the form of United States Currency. Deputies recovered a set of electronic scales and eleven tin cups containing a white residue that field tested positive for cocaine. Deputies also located several brown paper bags identical to the paper bag seized from Michael Lee WALKER and Tisi Nicole JACKSON. In addition, deputies located \$5,200.00 of counterfeit United States Currency and a computer printed they believe was used to print the counterfeit currency.


7) WHEREFORE, your affiant respectfully requests that a complaint and an arrest

warrant be issued against Edward Earl Tiller, Michael Lee Walker, and Tisi Nicole Jackson for violations of Title 21, United States Code, Section 841(a)(1), possession of cocaine and cocaine base with intention to distribute.



DEVIN WHITTLE  
SPECIAL AGENT, DEA

Sworn to and Subscribed before me  
this 10th day of February, 2006.



VANZETTA PENN MCPHERSON  
UNITED STATES MAGISTRATE JUDGE  
MIDDLE DISTRICT OF ALABAMA